

[Parties and Counsel Listed on Signature Pages]

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS FILING RELATES TO:  
  
ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR (PHK)

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING EXHIBITS TO  
JOINT LETTER BRIEF REGARDING  
WHETHER CERTAIN META  
DOCUMENTS ARE PROTECTED BY  
ATTORNEY-CLIENT PRIVILEGE (ECF  
2474)**

Honorable Yvonne Gonzalez Rogers

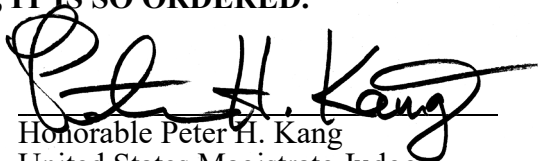
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, and through their undersigned counsel, the MDL Personal Injury and School District (“PI/SD”) Plaintiffs, the JCCP Personal Injury Plaintiffs (“JCCP Plaintiffs”), and the MDL State Attorneys General (“State AGs”) (collectively, “Plaintiffs”); and the Meta Defendants (“Meta”) hereby stipulate and agree that the Court may properly consider Exhibits A-F, M-O, and H-L attached to the Parties’ Joint Letter Brief Regarding Whether Certain Meta Documents Are Protected by Attorney-Client Privilege (“November 20 Letter-Brief”) (ECF No. 2474), regardless of whether those exhibits were previously stipulated-to (*see* ECF 2448). The Parties thus withdraw their objections to the Court considering the other side’s Exhibits as stated in the November 20 Letter-Brief.

**IT IS SO STIPULATED**, through Counsel of Record.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: November 24, 2025

  
Honorable Peter H. Kang  
United States Magistrate Judge

Respectfully submitted,

DATED: November 24, 2025

By: /s/ Lexi J. Hazam

LEXI J. HAZAM

**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**

275 BATTERY STREET, 29TH FLOOR  
SAN FRANCISCO, CA 94111-3339

Telephone: 415-956-1000  
lhazam@lchb.com

PREVIN WARREN

**MOTLEY RICE LLC**

401 9th Street NW Suite 630  
Washington DC 20004

Telephone: 202-386-9610  
pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER

**SEEGER WEISS, LLP**

55 CHALLENGER ROAD, 6TH FLOOR  
RIDGEFIELD PARK, NJ 07660

Telephone: 973-639-9100  
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel and Settlement Counsel

JENNIE LEE ANDERSON

**ANDRUS ANDERSON, LLP**

155 MONTGOMERY STREET, SUITE 900  
SAN FRANCISCO, CA 94104

Telephone: 415-986-1400  
jennie@andrusanderson.com

Liaison Counsel and Ombudsperson

MATTHEW BERGMAN

**SOCIAL MEDIA VICTIMS LAW CENTER**

821 SECOND AVENUE, SUITE 2100  
SEATTLE, WA 98104

Telephone: 206-741-4862  
matt@socialmediavictims.org

JAMES J. BILSBORROW  
**WEITZ & LUXENBERG, PC**  
700 BROADWAY  
NEW YORK, NY 10003  
Telephone: 212-558-5500  
jbilsborrow@weitzlux.com

ELLYN HURD  
**SIMMONS HANLY CONROY, LLC**  
112 MADISON AVE, 7TH FLOOR  
NEW YORK, NY 10016  
Telephone: 212-257-8482  
ehurd@simmonsfirm.com

ANDRE MURA  
**GIBBS MURA, A LAW GROUP**  
1111 BROADWAY, SUITE 2100  
OAKLAND, CA 94607  
Telephone: 510-350-9717  
amm@classlawgroup.com

MICHAEL M. WEINKOWITZ  
**LEVIN SEDRAN & BERMAN, LLP**  
510 WALNUT STREET  
SUITE 500  
PHILADELPHIA, PA 19106  
Telephone: 215-592-1500  
mweinkowitz@lfsbalw.com

MELISSA YEATES  
**KESSLER TOPAZ MELTZER & CHECK LLP**  
280 KING OF PRUSSIA ROAD  
RADNOR, PA 19087  
Telephone: 610-667-7706  
myeates@ktmc.com

Plaintiffs' Steering Committee Leadership

RON AUSTIN  
**RON AUSTIN LAW**  
400 MANHATTAN BLVD.  
HARVEY, LA 70058  
Telephone: 504-227-8100  
raustin@ronaustinlaw.com

1  
2 AELISH M. BAIG  
3 **ROBBINS GELLER RUDMAN & DOWD LLP**  
4 1 MONTGOMERY STREET, #1800  
5 SAN FRANCISCO, CA 94104  
6 Telephone: 415-288-4545  
7 AelishB@rgrd.com

8 PAIGE BOLDT  
9 **ANAPOL WEISS**  
10 130 N. 18TH STREET, #1600  
11 PHILADELPHIA, PA 19103  
12 Telephone: 215-929-8822  
13 pboldt@anapolweiss.com

14 THOMAS P. CARTMELL  
15 **WAGSTAFF & CARTMELL LLP**  
16 4740 Grand Avenue, Suite 300  
17 Kansas City, MO 64112  
18 Telephone: 816-701-1100  
19 tcartmell@wcllp.com

20 FELICIA CRAICK  
21 **KELLER ROHRBACK LLP**  
22 1201 THIRD AVENUE, SUITE 3400  
23 SEATTLE, WA 98101  
24 Telephone: 206-623-1900  
25 fcraick@kellerrohrback.com

26 SARAH EMERY  
27 **HENDY JOHNSON VAUGHN EMERY PSC**  
28 600 WEST MAIN STREET, SUITE 100  
LOUISVILLE, KY 40202  
Telephone: 859-600-6725  
semery@justicestartshere.com

KIRK GOZA  
**GOZA HONNOLD**  
9500 NALL AVE. #400  
OVERLAND PARK, KS 66207  
Telephone: 913-412-2964  
Kgoza @gohonlaw.com

RONALD E. JOHNSON, JR.  
**HENDY JOHNSON VAUGHN EMERY PSC**

600 WEST MAIN STREET, SUITE 100  
LOUISVILLE, KT 40202  
Telephone: 859-578-4444  
rjohnson@justicestartshere.com

MATTHEW P. LEGG  
**BROCKSTEDT MANDALAS FEDERICO, LLC**  
2850 QUARRY LAKE DRIVE, SUITE 220  
BALTIMORE, MD 21209  
Telephone: 410-421-7777  
mlegg@lawbmf.com

SIN-TING MARY LIU  
**AYLSTOCK WITKIN KREIS &  
OVERHOLTZ, PLLC**  
17 EAST MAIN STREET, SUITE 200  
PENSACOLA, FL 32502  
Telephone: 510-698-9566  
mliu@awkolaw.com

JAMES MARSH  
**MARSH LAW FIRM PLLC**  
31 HUDSON YARDS, 11TH FLOOR  
NEW YORK, NY 10001-2170  
Telephone: 212-372-3030  
jamesmarsh@marshlaw.com

JOSEPH H. MELTER  
**KESSLER TOPAZ MELTZER & CHECK LLP**  
280 KING OF PRUSSIA ROAD  
RADNOR, PA 19087  
Telephone: 610-667-7706  
jmeltzer@ktmc.com

HILLARY NAPPI  
**HACH & ROSE LLP**  
112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: 212-213-8311  
hnappi@hrsclaw.com

EMMIE PAULOS  
**LEVIN PAPANTONIO RAFFERTY**  
316 SOUTH BAYLEN STREET, SUITE 600  
PENSACOLA, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

RUTH THI RIZKALLA  
**THE CARLSON LAW FIRM, PC**  
1500 ROSECRANS AVE., STE. 500  
MANHATTAN BEACH, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com

ROLAND TELLIS  
DAVID FERNANDES  
**BARON & BUDD, P.C.**  
15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: 818-839-2333  
rtellis@baronbudd.com  
dfernandes@baronbudd.com

DIANDRA "FU" DEBROSSE ZIMMERMANN  
**DICELLO LEVITT**  
505 20th St North  
Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205-855-5700  
fu@dicellolevitt.com

Plaintiffs' Steering Committee Membership

JOSEPH VANZANDT  
**BEASLEY ALLEN**  
234 COMMERCE STREET  
MONTGOMERY, LA 36103  
Telephone: 334-269-2343  
joseph.vanzandt@beasleyallen.com

Federal/State Liaison

*Attorneys for Individual Plaintiffs*

**ROB BONTA**

Attorney General  
State of California

/s/ Nicklas A. Akers

Nicklas A. Akers (CA SBN 211222)  
Senior Assistant Attorney General  
Bernard Eskandari (SBN 244395)  
Emily Kalanithi (SBN 256972)  
Supervising Deputy Attorneys General  
Nayha Arora (CA SBN 350467)  
David Beglin (CA SBN 356401)  
Megan O'Neill (CA SBN 343535)  
Joshua Olszewski-Jubelirer (CA SBN 336428)  
Marissa Roy (CA SBN 318773)  
Brendan Ruddy (CA SBN 297896)  
Deputy Attorneys General  
California Department of Justice  
Office of the Attorney General  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102-7004  
Phone: (415) 510-4400  
Fax: (415) 703-5480  
Joshua.OlszewskiJubelirer@doj.ca.gov

*Attorneys for Plaintiff the People of the State of  
California*



**PHILIP J. WEISER**

Attorney General  
State of Colorado

/s/ Krista Batchelder

Krista Batchelder, CO Reg. No. 45066, *pro hac vice*  
Deputy Solicitor General  
Shannon Stevenson, CO Reg. No. 35542, *pro hac vice*  
Solicitor General  
Elizabeth Orem, CO Reg. No. 58309, *pro hac vice*  
Assistant Attorney General  
Colorado Department of Law  
Ralph L. Carr Judicial Center  
Consumer Protection Section  
1300 Broadway, 7th Floor  
Denver, CO 80203  
Phone: (720) 508-6651  
krista.batchelder@coag.gov  
Shannon.stevenson@coag.gov  
Elizabeth.orem@coag.gov

*Attorneys for Plaintiff State of Colorado, ex rel.*  
*Philip J. Weiser, Attorney General*

**RUSSELL COLEMAN**

Attorney General  
Commonwealth of Kentucky

/s/ J. Christian Lewis

J. Christian Lewis (KY Bar No. 87109),  
*Pro hac vice*  
Philip Heleringer (KY Bar No. 96748),  
*Pro hac vice*  
Zachary Richards (KY Bar No. 99209),  
*Pro hac vice*  
Daniel I. Keiser (KY Bar No. 100264),  
*Pro hac vice*  
Matthew Cocanougher (KY Bar No. 94292),  
*Pro hac vice*  
Assistant Attorneys General  
1024 Capital Center Drive, Suite 200  
Frankfort, KY 40601  
CHRISTIAN.LEWIS@KY.GOV  
PHILIP.HELERINGER@KY.GOV  
ZACH.RICHARDS@KY.GOV  
DANIEL.KEISER@KY.GOV

MATTHEW.COCANOUGH@KY.GOV  
Phone: (502) 696-5300  
Fax: (502) 564-2698  
*Attorneys for Plaintiff the Commonwealth of Kentucky*

**MATTHEW J. PLATKIN**  
Attorney General  
State of New Jersey

/s/ Kashif T. Chand  
Kashif T. Chand (NJ Bar No. 016752008),  
*Pro hac vice*  
Attorney General  
Thomas Huynh (NJ Bar No. 200942017),  
*Pro hac vice*  
Assistant Section Chief, Deputy Attorney General  
Verna J. Pradaxay (NJ Bar No. 335822021),  
*Pro hac vice*  
Mandy K. Wang (NJ Bar No. 373452021),  
*Pro hac vice*  
Deputy Attorneys General  
New Jersey Office of the Attorney General,  
Division of Law  
124 Halsey Street, 5th Floor  
Newark, NJ 07101  
Tel: (973) 648-2052  
Kashif.Chand@law.njoag.gov  
Thomas.Huynh@law.njoag.gov  
Verna.Pradaxay@law.njoag.gov  
Mandy.Wang@law.njoag.gov

*Attorneys for Plaintiffs New Jersey Attorney General  
and the New Jersey Division of Consumer Affairs  
Matthew J. Platkin, Attorney General for the State of  
New Jersey, and Elizabeth Harris, Acting Director of the  
New Jersey Division of Consumer Affairs*

**BEASLEY ALLEN CROW METHVIN PORTIS &  
MILES, P.C.**

/s/ Joseph G. VanZandt

Joseph G. VanZandt  
218 Commerce Street  
Montgomery, AL 36104  
Tel.: (334) 269-2343  
Joseph.VanZandt@BeasleyAllen.com

KIESEL LAW LLP  
Paul R. Kiesel  
Mariana A. McConnell  
8648 Wilshire Blvd.  
Beverly Hills, CA 90211  
Tel: (310) 854-4444  
kiesel@kiesel.law  
mcconnell@kiesel.law

PANISH | SHEA | RAVIPUDI LLP  
Brian J. Panish  
Rahul Ravipudi  
Jesse Creed  
11111 Santa Monica Boulevard, Suite 700  
Los Angeles, California 90025  
Tel: (310) 477-1700  
Fax: (310) 477-1699  
panish@panish.law  
ravipudi@panish.law  
jcreed@panish.law

Rachel Lanier  
THE LANIER LAW FIRM, P.C.  
2829 Townsgate Road, Suite 100  
Westlake Village, CA 91361  
Tel.: 713-659-5200  
Rachel.Lanier@LanierLawFirm.com

*Co-Lead, Co-Liaison, and Leadership Counsel for JCCP  
Plaintiffs*

**COVINGTON & BURLING LLP**

By: /s/ Ashley M. Simonsen  
Ashley M. Simonsen, SBN 275203  
COVINGTON & BURLING LLP  
1999 Avenue of the Stars  
Los Angeles, CA 90067  
Telephone: (424) 332-4800  
Facsimile: + 1 (424) 332-4749  
Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*  
Paul W. Schmidt, *pro hac vice*  
COVINGTON & BURLING LLP  
One City Center  
850 Tenth Street, NW  
Washington, DC 20001-4956  
Telephone: + 1 (202) 662-6000  
Facsimile: + 1 (202) 662-6291  
Email: pajones@cov.com

*Attorneys for Defendants Meta Platforms, Inc. f/k/a  
Facebook, Inc.; Facebook Holdings, LLC; Facebook  
Operations, LLC; Meta Payments Inc. f/k/a Facebook  
Payments Inc.; Meta Platforms Technologies, LLC  
f/k/a Facebook Technologies, LLC; Instagram, LLC;  
and Siculus LLC f/k/a Siculus, Inc.*

**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: November 24, 2025

By: /s/ Ashley M. Simonsen